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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

Trevor Kevin Baylis

CASE NO. 2:23-cv-01653-RSM

[to be filled in by Clerk's Office]

COMPLAINT FOR A CIVIL CASE

Jury Trial: ☐ Yes ☐ No

Plaintiff(s),

v.

Valve Corporation, also known as,  
Valve Software

Defendant(s).

**I. THE PARTIES TO THIS COMPLAINT**

**A. Plaintiff(s)**

*Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.*

Name	Trevor Kevin Baylis
Street Address	Jankanraitti 10 A 4
City and County	Tampere
State and Zip Code	33560, FINLAND
Telephone Number	3587225899

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## B. Defendant(s)

*Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.*

## Defendant No. 1

Name	Valve Corporation (A.K.A Valve Software)
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Job or Title <i>(if known)</i>	
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Street Address	Floor 14, 10400 NE 4th St,
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City and County	Bellevue WA,
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State and Zip Code	Washington, 98004, USA
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Telephone Number	(425) 889-9642
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## Defendant No. 2

Name	
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Job or Title <i>(if known)</i>	
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Street Address	
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City and County	
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State and Zip Code	
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Telephone Number	
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## Defendant No. 3

Name	
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Job or Title <i>(if known)</i>	
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Street Address	
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City and County	
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State and Zip Code	
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Telephone Number	
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Defendant No. 4

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

**II. BASIS FOR JURISDICTION**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*select all that apply*)

☐ Federal question:

If checked complete section A.

☐ Diversity of citizenship:

If checked complete section B.

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case. *Attach additional pages if needed.*

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1 B. If the Basis for Jurisdiction Is Diversity of Citizenship

2 1. The Plaintiff(s)

3 a. If the plaintiff is an individual.

4 The plaintiff (name) **Trevor Kevin Baylis**, is a citizen of the  
5 State of (name) **United Kingdom (Domicile: Finland)**.

6 b. If the plaintiff is a corporation.

7 The plaintiff, (name) \_\_\_\_\_, is incorporated under  
8 the laws of the State of (name) \_\_\_\_\_, and has its principal  
9 place of business in the State of (name) \_\_\_\_\_.

10 *(If more than one plaintiff is named in the complaint, attach an additional page providing*  
11 *the same information for each additional plaintiff.)*

12 2. The Defendant(s)

13 a. If the defendant is an individual.

14 The defendant, (name) \_\_\_\_\_, is a citizen of the  
15 State of (name) \_\_\_\_\_. Or is a citizen of  
16 (foreign nation) \_\_\_\_\_.

17 b. If the defendant is a corporation.

18 The defendant, (name) **Valve Corporation**, is incorporated under  
19 the laws of the State of (name) **Washington (state)**, and has its principal  
20 place of business in the State of (name) **Washington (state)**.

21 Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
22 and has its principal place of business in (name) \_\_\_\_\_.

23 *(If more than one defendant is named in the complaint, attach an additional page*  
24 *providing the same information for each additional defendant.)*

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3. The Amount in Controversy.

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because (*explain*) *Attach additional pages if needed:*

1. Defendant owes at least \$1 096 451,5 actual damages based on information and belief to be the amount of gross revenue generated though unauthorized distribution by Valve Corporation of plaintiffs copyrighted works which is likely to go up over time as more revenue is generated by continued infringement.

2. This figure is based on 'Revenue Sales Numbers, Boxleiter Method' to calculate gross revues from user reviews submitted by customers paying Valve Corporation for use and access to the infringing games.

### III. STATEMENT OF CLAIM

*Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.*

3. Valve Corporation has distributed plaintiff's copyrighted works worldwide without authorization from plaintiff via numerous games related to the film Iron Sky of which plaintiff is an author. In particular Plaintiff created numerous 3D modeled space craft that appear prominently and feature as the main game-play of the games being distributed. Film footage from Iron Sky also appears in the game featuring plaintiff's copyrighted material.

4. Valve Corporation were sent a DMCA request to remove the games. However, Valve Corporation continues to willfully infringe and monetize plaintiff's copyrighted material.

### IV. RELIEF

*State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. Attach additional pages if needed.*

5. Plaintiff asks court to order Valve Corporation to pay them at least \$1 096 451,5 for actual damages as this is believed to be gross revenue generated by infringing actions as of 4 October 2023.

6. Plaintiff asks court to order Valve Corporation to pay them further accruing actual damages from 4 October 2023 as the willful infringement is ongoing.

7. Plaintiff asks court to order Valve Corporation to cease their willfully infringing actions against Plaintiff.

### V. CERTIFICATION AND CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper

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1 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;  
2 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or  
3 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so  
4 identified, will likely have evidentiary support after a reasonable opportunity for further  
5 investigation or discovery; and (4) the complaint otherwise complies with the requirements of  
6 Rule 11.

7 I agree to provide the Clerk's Office with any changes to my address where case-related  
8 papers may be served. I understand that my failure to keep a current address on file with the  
9 Clerk's Office may result in the dismissal of my case.

Date of signing:

30<sup>th</sup> OCT 2023

Signature of Plaintiff

Trevor Baylis

Printed Name of Plaintiff

TREVOR KEVIN BAYLIS

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff